

From: [Jim Oilcan](#)
To: [Gowers, Joe](#)
Cc: SHECK@RINGWOODNJ.NET; [Thomas Conway](#)
Subject: Re: Ringwood Mines/Landfill site - Response to Comments to December 2020 draft Operable Unit 2 Remedial Action Work Plan
Date: Monday, April 19, 2021 11:05:58 AM
Attachments: [RECON vs NAAQS PM levels.pdf](#)

Joe,

AIR QUALITY

I am still concerned with the effects of the construction on the nearby residents. RECON's responses to my questions concerning dust particles per NAAQS are not satisfactory.

- a) NAAQS requires separate measurement of PM10 and PM2.5 since there are separate allowable levels. Recon's response that PM10 includes both is correct, but that does not allow determination of whether PM2.5 levels are within the allowable limits, which are much lower than PM10. (See attached excerpt from EPA NAAQS and CAMP page 8.)
- b. NAAQS PM10 allowable level of 150 micrograms per cubic meter average over 24 hours, **which cannot be exceeded more than once per year.** The CAMP sets the PM10 action level at 150, which is based on a hand-held 15 minute sample. There is no information of frequency of sampling, nor how they plan to measure nights and weekends.
- c. The NAAQS PM2.5 allowable level is 12 micrograms per cubic meter annual mean, averaged over 3 years. Since PM2.5 is not measured, there is no determination of whether it is exceeded.
- d. Why are hand-held measurements taken, and not air monitoring stations which operate 24 hours per day? These are appropriate outside the work area.
- e. CAMP appendix A, Table 1 - Footnote c "Exposure basis for this project: 5 days per week, 10 hours per day".
These are OSHA levels for "healthy workers", not NAAQS levels for the public, including sick people and children who live there 24 hours per day, 7 days per week
- f. CAMP appendix A, Table 2 - Footnote c- same as above.

JOE, PLEASE HAVE EPA STAFF REVIEW THE PROPOSED CAMP ACTION LEVELS AND MEASUREMENT PLAN TO DETERMINE IF THEY ARE APPROPRIATE FOR THE RESIDENTIAL NEIGHBORS.

DUST CONTROL ON STREETS

The CAMP only addresses dust control within the work site. However the trucks can carry dust onto the residential streets.

The CAMP mentions a "water truck", but not a street sweeper/vacuum truck.

The local streets should be swept/vacuumed periodically as needed, and at the end of each work shift.

FYI - At the quarry in Pompton Lakes, the residential streets are swept and wet every few hours to control dust.

LOCATIONS OF RESIDENCES NEAR WORK SITES

My comment was to show the location of the residences near the work site for wind-born dust. RECON replied that they do that.

This is correct only for one residence near Cannon Mine Pit - but the home is not highlighted

and lost against the contour lines.

Provide three additional drawings, using smaller scale if necessary, to show the nearby residences. Highlight them so they are easily recognized on the drawings.

Thank You,
Jim Guinan,
Ringwood Rersident

On Fri, Apr 16, 2021 at 1:12 PM Thomas Conway [REDACTED] > wrote:
Joe,

Thanks for the reminder. I was worried I missed the deadline. Tax time was a bear this year since the corporations I handle were not extended.

I met with Commissioner Kulak today and will relay the deadline. We should have something for you by Monday morning.

-Tom

On Fri, Apr 16, 2021 at 1:04 PM Gowers, Joe <Gowers.Joe@epa.gov> wrote:

Hi Tom and Jim – Please note that I intend to get back to Ford on Monday, 4/19, concerning the adequacy of the attached Response to Comments. Please let me know if you have concerns regarding the manner in which RECON intends to address your concerns. Thanks.

Joe

Joseph Gowers

Project Manager

U.S. EPA

New Jersey Remediation Branch

(212)637-4413

From: Gowers, Joe
Sent: Monday, March 22, 2021 8:20 AM
To: Thomas Conway <[REDACTED]>; guinan <[REDACTED]>
Cc: Seppi, Pat <Seppi.Pat@epa.gov>
Subject: Ringwood Mines/Landfill site - Response to Comments to December 2020 draft Operable Unit 2 Remedial Action Work Plan

Hi Tom and Jim – Attached please find a Response to Comments concerning the December 2020 draft Operable Unit 2 Remedial Action Work Plan for the Ringwood Mines/Landfill site. Please note that the attached Response to Comments was prepared by de maximis, inc and RECON for the Ford Motor Company. Pat Seppi will be sending out an email with this document to all stakeholders this week. EPA and NJDEP will review the attached Response to Comments to determine its adequacy, and provide a response to de maximis by mid-April. Please feel free to contact me if you have any questions concerning this matter.

Joe

Joseph Gowers

Project Manager

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